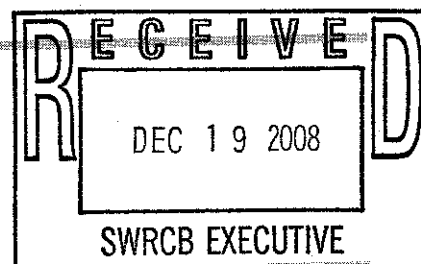


commentletters - 1/6/09 BOARD MEETING RECYCLED WATER POLICY COMMENTS

From: Paul Johnston
To: commentletters@waterboards.ca.gov
Date: Friday, December 19, 2008 11:37 AM
Subject: 1/6/09 BOARD MEETING RECYCLED WATER POLICY COMMENTS



The following comments are offered for consideration on the DRAFT Recycled Water Policy:

1. A goal listed on lines 35 and 36 is to increase the amount of water conserved in urban and industrial uses by comparison to 2007 by at least 20% by 2020. This goal fails to recognize or take into consideration water conservation measures already implemented by various water suppliers. Water has, and is being conserved by a number of agencies in amounts ranging from 7 to 20 percent based on the implementation of best management practices. Imposing another 20 percent on top of what has been accomplished doesn't appear reasonable and past activities should be recognized.
2. Mandate for Use of Recycled Water line 85 etc. Imposing a mandate requires available funds by both the State Water Board and the agencies. There have been insufficient funds for the number of available water recycling projects since the Water Board developed the Water Recycling Program in the 70s. Lines 110-113 states the mandates assume there will be sufficient funding from multiple sources. This hasn't been the case to date. Any mandate should identify the available funds or condition the mandate on the availability of funds. In addition, every mandate has exceptions. There should be some recognition that recycled water may not be cost-effective, locally or in comparison to other available water supply alternatives.
3. Evaluating progress towards the recycled water use mandates listed in the Draft Policy (lines 89-97). The State Water Board is to evaluate progress towards these mandates biennially etc. There currently are no reporting requirements, mechanisms, databases, or procedures in place to enable the State Water Board to receive, compile and collate recycled water use information throughout the state. Additional information on how this might be accomplished would be beneficial.
4. Water recycling and storm water recharge/use goals and objectives listed on line 266 with salt and nutrient management plans. It's suggested that the water recycling and storm water recharge/use component language be expanded to include usage/delivery information in addition to the goals and objectives listed.
5. Within Item (4) of the criteria for streamlined permitting (lines 352-354) it states recycled water producers shall monitor and communicate to the recycled water users the nutrient levels in their recycled water to enable them to appropriately use fertilizers. Clarification might be offered on how this is to occur. Nutrient levels may vary with the seasons, the strength/type of wastewater being treated, whether the treated effluent is denitrified, etc. As such, how often should the producers notify the users? On the same issue, it's feasible that users, when notified, may not know how to adjust/amend their fertilizer application. Are we to assume they will or is the producer to provide this information?